

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

TAMEKA WORDLOW and)
JASON LEGRONE,)
)
Plaintiffs,)
)
VS.) Docket No. 2:11-cv-02127
) JURY DEMANDED
STATE FARM FIRE AND CASUALTY)
COMPANY,)
)
Defendant.)

**JOINT MOTION TO AMEND RULE 16 SCHEDULING ORDER
TO EXTEND DEADLINES**

Come now jointly the parties, by and through counsel, and for good cause shown request that this Honorable Court amend the Rule 16 Scheduling Order in this case and extend certain deadlines. In support of this motion, the parties jointly state as follows:

1. On March 21, 2011, this Honorable Court entered the current Rule 16 Scheduling Order.
2. The overall discovery deadline in the current Order is October 31, 2011, but the deadline for completing depositions and written discovery was August 15, 2011. The deadline for filing dispositive motions is November 30, 2011.
3. The parties have been actively engaging in settlement negotiations in this case. The parties are presently conferring in good faith in an effort to resolve this entire case.
4. The parties have conferred and agreed that an amendment to the Rule 16 Scheduling Order would be in the best interest of both parties in light of the reasonable potential for settlement in this case and also because both parties

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need additional time to complete discovery in the event settlement is not achieved.

5. As such, an extension of the deadlines in this case would save the time and resources of both the parties and this Court.
6. The parties are requesting that the Court amend the Rule 16 Scheduling Order as follows:
 - a. Extend deadline for completing document production, depositions, interrogatories, subpoenas, and requests for admissions until December 31, 2011.
 - b. Extend deadline for filing dispositive motions until January 31, 2012.
 - c. Continue all remaining court appearances and trial as appropriate in light of revised deadlines.

WHEREFORE, for good cause shown, the parties jointly request this Honorable Court to amend the Rule 16 Scheduling Order. A proposed revised Rule 16 Scheduling Order will be submitted electronically to this Honorable Court.

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Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

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